

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: RONALD REBMANN ) Chapter 13  
 )  
 ) No. 23-14087  
 )  
 Debtor(s) ) Judge A. Benjamin Goldgar

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on January 2, 2024, at 09:30 a.m., I will appear before the Honorable A. Benjamin Goldgar, or any judge sitting in that judge's place, **either** in courtroom 642 of the Everett McKinley Dirksen United States Courthouse, or electronically as described below, and present the motion of DEBTOR'S ATTORNEY [to/for] WITHDRAW AS ATTORNEY, a copy of which is attached.

**All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.**

You may appear electronically by video or by telephone.

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is 161 319 7225, and the passcode is 584922. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By: /s/ JOHN HADERLEIN, ESQ.

JOHN HADERLEIN, ESQ.  
815-C COUNTRY CLUB DRIVE  
LIBERTYVILLE, IL 60048  
312-316-4614  
JOHN@BKLaw1.COM  
ARDC# 6197623

CERTIFICATE OF SERVICE

I, JOHN HADERLEIN, ESQ., certify [if an attorney]/declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on December 26, 2023, at 5:00 PM.

/S/ JOHN HADERLEIN, ESQ.

[Signature]

**LIST:**

**23-14087 Notice was electronically mailed on December 26, 2023 to:**

Joel P Fonferko on behalf of Creditor Deutsche Bank National Trust Company as Trustee for IndyMac Indx Mortgage Loan Trust 2007-AR11, Mortgage Pass-Through Certificates Series 2007-AR11.

bkpleadingsNORTHERN@il.cslegal.com

John A Haderlein on behalf of Debtor 1 RONALD REBMANN

john@bklaw1.com

Patrick S Layng

USTPRegion11.ES.ECF@usdoj.gov

Marilyn O Marshall

courtdocs@chi13.com

Joel A Schechter, ESQ on behalf of Creditor Anne Gordon

joel@jasbklaw.com, joelschechter1953@gmail.com;r60549@notify.bestcase.com

Martin D. Tasch on behalf of Creditor CIBC Bank USA

mtasch@momkus.com, cbednarski@momkus.com

Timothy R Yueill on behalf of Creditor WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR BANC OF AMERICA FUNDING CORPORATION, Mortgage Pass-Through Certificates, Series 2007-E

timothy@nevellaw.com

**23-14087 Notice will not be electronically mailed to:**

Ally Bank, c/o AIS Portfolio Services, LLC

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118

**23-14087 Notice was sent by first-class US Mail on December 26, 2023 to:**

Ronald Rebmman, Debtor

736 Florsheim Avenue

Suite #12

Libertyville, IL 60048

Ally Bank, c/o AIS Portfolio Services, LLC  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118

Illinois Department of Revenue  
101 W. Jefferson  
Springfield, IL 62702

IDES  
607 E. Adams  
8<sup>th</sup> Floor  
Springfield, IL 62701

Florsheim Professional Center Association  
c/o Patricia Apgar/Bankruptcy  
812 Cali Court  
Libertyville, IL 60048

American Express National Bank  
c/o Becket and Lee ::P  
PO Box 3001  
Malvern, PA 19355-0701

American Express National Bank  
c/o Becket and Lee ::P  
PO Box 3001  
Malvern, PA 19355-0701

CIBC Bank USA

Attn: Bankruptcy Dept.

5260 Old Orchard Rd.

Skokie, IL 60077

Citibank, N.A.

5800 S. Corporate Pl.

Sioux Falls, SD 57108-5027

Portfolio Recovery Associates, LLC

PO Box 41067

Norfolk, VA 23541

McKesson Specialty Care Distribution, LLC

Stephanie Hampton

6651 Gate Parkway

Jacksonville, FL 32256

Deutsche National Bank Trust Company

c/o PHH Mortgage Corporation

Attn: Bankruptcy Dept.

PO Box 24605

West Palm Beach, FL 33416-4605

Ally Bank, c/o AIS Portfolio Services, LLC

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118

CIBC BANK USA  
ATTN: BANKRUPTCY DEPT.  
5260 OLD ORCHARD RD.  
SKOKIE, IL 60077

NATIONSTAR MORTGAGE  
ATTN: BANKRUPTCY DEPT.  
8950 CYPRESS WATERS BLVD.  
DALLAS, TX 75063

ALLY  
500 WOODWARD AVE.  
FLOOR 10  
DETROIT, MI 48226

ANNE GORDON (REBMANN)  
1401 MINARD LANE  
LIBERTYVILLE, IL 60048

AMERICAN EXPRESS  
BANKRUPTCY DEPARTMENT  
PO BOX 981535  
EL PASO, TX 79998

BARCLAYS CARD SERVICES  
BANKRUPTCY DEPT.  
PO BOX 8802  
WILMINGTON, DE 19899

CITIBANK/COSTCO  
BANKRUPTCY DEPT.  
PO BOX 790046  
ST. LOUIS, MO 63179

CITIBANK  
BANKRUPTCY DEPT.  
PO BOX 6500  
SIOUX FALLS, SD 57117

SMALL BUSINESS ADMINISTRATION  
BANKRUPTCY DEPT.  
409 3RD ST., SW  
WASHINGTON, DC 20416

UNITED STATES ATTORNEY  
CIVIL PROCESS CLERK  
219 SOUTH DEARBORN ST.  
ROOM 500  
CHICAGO, IL 60604

WESTERLY APARTMENTS  
ATTN: BANKRUPTCY DEPT.  
740 ABERDEEN ST.  
CHICAGO, IL 60642

BURKETT & BEATTIE, INC.  
736 FLORSHEIM DRIVE  
SUITE #10  
LIBERTYVILLE, IL 60048

MCKESSON SPECIALTY CARE DIST.

ATTN: BANKRUPTCY DEPT.

401 MASON RD.

LAVERGNE, TN 37086

UROPARTNERS – BANKRUPTCY DEPT.

755 S. MILWAUKEE AVE., SUITE 223

LIBERTYVILLE, IL 60048

CAPITAL ONE

BANKRUPTCY DEPT.

PO BOX 31293

SALT LAKE CITY, UT 84131

United States Attorney Civil Process Clerk

219 S. Dearborn St., Room 500

Chicago, IL 60604

MARQUETTE MANAGEMENT (THE MILTON)

ATTN: BANKRUPTCY DEPT.

145 MORRIS LANE

LAKE FOREST, IL 60045

CIBC

ATTN: BANKRUPTCY DEPT.

5250 OLD ORCHARD RD.

SKOKIE, IL 60077



CITIBUSINESS

ATTN: BANKRUPTCY DEPT.

PO BOX 790046

ST. LOUIS, MO 63179

VISA SIGNATURE

ATTN: BANKRUPTCY DEPT.

PO BOX 680493

DALLAS, TX 75266

ABBVIE

ATTN: BANKRUPTCY DEPT.

62671 COLLECTION CENTER DR.

CHICAGO, IL 60693

COMCAST BUSINESS

1701 JFK BLVD.

PHILADELPHIA. PA 19103

CANDELA MEDICAL

251 LOCKE DRIVE

MARLBOROUGH, MA 01752

SERVICEMASTER

ATTN: BANKRPUTCY

373 ATLANTA AVE. SE

ATLANTA, GA 30315

ABM BANKRUPTCY DEPT.

PO BOX 893

MUNDELEIN, IL 60060

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE:**

RONALD REBMANN,  
DEBTOR,

)  
)  
)  
)  
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)  
)

No. 23-14087  
Chapter 13  
Judge Goldgar

**MOTION TO WITHDRAW AS ATTORNEY**

NOW COMES ATTORNEY JOHN HADERLEIN (“Attorney”), counsel for RONALD REBMANN, DEBTOR (“Debtor”), and notice having been timely and properly served upon Debtor, all creditors and parties of record, does here present this motion to withdraw as attorney as follows:

1. Debtor filed this Chapter 13 case in 2023, the 341 meeting was held, but the plan is not yet confirmed.
2. Debtor’s primary asset is his business property located at 736 Florsheim Drive, Suite #12, Libertyville, Illinois 60048 (“property”).
3. Subsequent to Debtor’s filing the petition, Anne Gordon (“Gordon”), the ex-wife of Debtor, retained counsel.
4. Gordon filed a routine motion for a 2004 examination, which was thereafter granted.
5. On the representation of Gordon’s attorney, Gordon signed a personal guarantee related to the CIBC mortgage which is secured by the property.
6. Attorney for Gordon states that she and Debtor agreed in their marital settlement

agreement that the property would be placed for sale upon Debtor's missing two mortgage payments. CIBC has called the loan related to Debtor's non-payment of his obligations pursuant to the mortgage, and has filed an objection to the mortgage's treatment under the plan as proposed by Debtor.

7. On December 22, 2023, sent Attorney a 2004 subpoena, notice that CIBC had just sued Gordon pursuant to the personal guarantee that she signed, and a demand for Debtor to sell the property pursuant to the marital settlement agreement.

8. This now has become a contested matter in that there now exists a conflict between Debtor's filing for bankruptcy relief in order to retain the property, and Gordon's recent demand for Debtor to sell the property.

9. Attorney is not able to continue representation in this case, because it now has become contested.

10. Attorney did not agree to handle this case as a contested matter.

11. As a result, Attorney prays that he be allowed to withdraw as attorney to Debtor in this case, and allow Debtor to retain alternate counsel.

WHEREFORE, Debtors pray that this Honorable Court:

1. Allow John Haderlein to withdraw as attorney for Debtor, Ronald Rebmann;
2. Grant Debtor, Ronald Rebmann time to retain alternate counsel;
3. Grant such other relief as this Honorable Court deems equitable and proper.

RESPECTFULLY SUBMITTED:

*s/ John Haderlein, Esq.*

.....  
John Haderlein, Esq.  
Attorney for Debtor

LAW OFFICES OF JOHN HADERLEIN, ESQ.  
A CHAPTER 7/13 BANKRUPTCY DEBT RELIEF AGENCY  
815-C COUNTRY CLUB DRIVE  
LIBERTYVILLE, IL 60048  
(312) 316-4614 (voice/text)  
ARDC NO: 6197623  
EMAIL: [john@bklaw1.com](mailto:john@bklaw1.com)

*12/26/2023 11:21 AM*